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8 MARSHACK

9 UNITED STATES BANKRUPTCY COURT  
10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

11 In re

12 THE LITIGATION PRACTICE GROUP P.C.,  
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14 Debtor.  
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Case No: 8-23-bk-10571-SC

Chapter 11

TRUSTEE’S STATUS REPORT RE:  
OMNIBUS OBJECTION TO PROOFS OF  
CLAIM FILED FOR ALLEGED  
ADMINISTRATIVE CLAIMS

Hearing:

Date: January 16, 2025

Time: 11:00 a.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C – Via Zoom  
411 W. Fourth Street  
Santa Ana, CA 92701

1 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,  
2 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

3 Richard A. Marshack, in his capacities as Chapter 11 Trustee of the Bankruptcy Estate  
4 (“Estate”) of The Litigation Practice Group P.C. (“Debtor”) and liquidating trustee of the LPG  
5 Liquidation Trust (collectively, “Trustee”), hereby submits this Status Report Re the Trustee’s  
6 Omnibus Objection to Proofs of Claim Filed for Alleged Administrative Claims and represents as  
7 follows.

8 **1. Status Report**

9 On September 24, 2024, Trustee filed an “Omnibus Objection to Proofs of Claim Filed for  
10 Alleged Administrative Claims” (“Claim Objection”). Docket No. 1747.

11 The hearing on the Claim Objection was set for November 14, 2024.

12 On November 13, 2024, as Docket No. 1910, Trustee filed a “Declaration Re: No Timely  
13 Response Filed and Served Re: Chapter 11 Trustee’s Omnibus Objection to Proofs of Claim Filed  
14 for Alleged Administrative Claims.”

15 On November 22, 2024, as Docket No. 1935, the Court entered an “Order Granting Chapter  
16 11 Trustee’s Omnibus Objection to Proofs of Claim Filed for Alleged Administrative Claims”  
17 (“Order”). The Order, *inter alia*:

18 (1) Continued the hearing on the Claim Objection to January 16, 2025, at 11:00 a.m. as to the  
19 following claims (collectively, “Continued Claims”):

- 20 a. Claim No. C571-100717.1, filed by Carlos Bascal;  
21 b. Claim No. C571-101933.1, filed by Gustavo Romani;  
22 c. Claim No. C571-102658.1, filed by Jacqueline Fomby-Lewis;  
23 d. Claim No. C571-102205.1, filed by Kermic P. Basat, Jr.;  
24 e. Claim No. C571-100496.1, filed by Keysha Everage;  
25 f. Claim No. C571-101660.1, filed by Nationwide Appearance Attorneys, LLC; and  
26 g. Claim No. C571-101009.1, filed by Stephanie Kay Albertson.

1 (2) Ordered Trustee to provide notice of the continued hearing on the Continued Claims no  
2 later than November 30, 2024, with a proof of service to be filed no later than December  
3 5, 2024; and

4 (3) Ordered Trustee to file a status report seven days in advance of the January 16, 2025,  
5 continued hearing, detailing whether an opposition was filed.

6 On November 27, 2024, as Docket No. 1961, the Trustee filed a “Notice of Continued  
7 Hearing on Chapter 11 Trustee’s Omnibus Objection to Proofs of Claim Filed for Alleged  
8 Administrative Claims.”

9 On December 2, 2024, Trustee filed “Proof of Service of Notice of Continued Hearing on  
10 Chapter 11 Trustee’s Omnibus Objection to Proofs of Claim Filed for Alleged Administrative  
11 Claims,” which included proof of service by United States Mail at the following addresses:

12 (1) CARLOS BACSAL 1655 SIERRA VERDE RD CHULA VISTA, CA 91913;

13 (2) CARLOS BACSAL 1655 SERRA VERDE RD CHULA VISTA, CA 91913;

14 (3) CARLOS BACSAL 41961 MARGARITA RD, APT 13 TEMECULA, CA 92591;

15 (4) GUSTAVO ROMANI 16327 W WOODBINE CR VERNON HILLS, IL 60061;

16 (5) GUSTAVO ROMANI 16327 WOODBINE CR VERNON HILLS, IL 60061;

17 (6) JACQUELINE FOMBY-LEWIS 1637 TAMERA GARDENS AVE FORT WAYNE, IN  
18 46816;

19 (7) JACQUELINE FOMBY-LEWIS 1637 TAMERA GARDENS AVE FORT WAYNE, IN  
20 48616;

21 (8) KERMIC P BASAT JR 303 MANOR HOUSE LN LAFAYETTE, LA 70507;

22 (9) KERMIC P BASAT JR 303 MANOR LN LAFAYETTE, LA 70507;

23 (10) KEYSHA EVERAGE 69070 ALISO RD CATHEDRAL CITY, CA 92234;

24 (11) KEYSHA EVERAGE 690710 ALISO RD CATHEDRAL CITY, CA 92234;

25 (12) NATIONWIDE APPEARANCE ATTORNEYS, LLC C/O CIFF UMANS 5737  
26 KANAN ROAD, #628 AGOURA HILLS, CA 91301;

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- 1 (13) NATIONWIDE APPEARANCE ATTORNEYS, LLC ATTN: OFFICER, A  
2 MANAGING OR GENERAL AGENT, OR TO ANY OTHER AGENT AUTHORIZED  
3 BY APPOINTMENT OR LAW TO RECEIVE SERVICE OF PROCESS 5737 KANAN  
4 ROAD, #628 AGOURA HILLS, CA 91301;
- 5 (14) NATIONWIDE APPEARANCE ATTORNEYS, LLC C/O CLIFF UMANS,  
6 MANAGING MEMBER 5737 KANAN ROAD, #628 AGOURA HILLS, CA 91301;
- 7 (15) NATIONWIDE APPEARANCE ATTORNEYS, LLC C/O REGISTERED AGENT  
8 RICHARD C SLATER 7302 YELLOWSTONE RD CHEYENNE, WY 82009 US;
- 9 (16) NATIONWIDE APPEARANCE ATTORNEYS, LLC ATTN: OFFICER, A  
10 MANAGING OR GENERAL AGENT, OR TO ANY OTHER AGENT AUTHORIZED  
11 BY APPOINTMENT OR LAW TO RECEIVE SERVICE OF PROCESS 1920  
12 THOMES AVENUE SUITE 610 CHEYENNE, WY 82001;
- 13 (17) NATIONWIDE APPEARANCE ATTORNEYS, LLC ATTN: OFFICER, A  
14 MANAGING OR GENERAL AGENT, OR TO ANY OTHER AGENT AUTHORIZED  
15 BY APPOINTMENT OR LAW TO RECEIVE SERVICE OF PROCESS PO BOX 1453  
16 CHEYENNE, WY 82003;
- 17 (18) STEPHANIE KAY ALBERTSON 933 EMERSON RD COHUTTA, GA 30710; and  
18 (19) STEPHANIE KAY ALBERTSON 933 EMERSON RD COHUTTA, GA 90710.

19 As of the date of filing of this Status Report, no responses have been filed to the Claim  
20 Objection regarding the Continued Claims, nor has Trustee otherwise received a response regarding  
21 the Continued Claims, with the exception of the “Response to the Proposed Objections on Chapter  
22 11 Trustee’s Omnibus Objection to Proofs of Claim Filed for Alleged Administrative Claims,” filed  
23 on December 17, 2024, by Carlos Bascal (“Bascal Objection”). Docket No. 1989. On January 9,  
24 2025, the Trustee filed a reply to the Bascal Objection. Docket No. 2018.

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1 The Trustee respectfully requests that the Court grant the Claim Objection as to the  
2 Continued Claims at the continued hearing on January 16, 2025.

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4  
5 DATED: January 9, 2025

MARSHACK HAYS WOOD LLP

6 By: /s/ Bradford N. Barnhardt  
7 D. EDWARD HAYS  
8 AARON E. DE LEEST  
9 BRADFORD N. BARNHARDT  
Attorneys for Chapter 11 Trustee and  
Liquidating Trustee, RICHARD A.  
MARSHACK

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **TRUSTEE'S STATUS REPORT RE: OMNIBUS OBJECTION TO PROOFS OF CLAIM FILED FOR ALLEGED ADMINISTRATIVE CLAIMS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 9, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **January 9, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.  
17542 17TH ST  
SUITE 100  
TUSTIN, CA 92780-1984

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 9, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY:**

**PRESIDING JUDGE'S COPY**

HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT  
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C  
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 9, 2025  
Date

Layla Buchanan  
Printed Name

/s/ Layla Buchanan  
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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